

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF NEW YORK

EXPRESS GOLD CASH, INC.

Plaintiff,

vs.

**NOTICE OF MOTION IN LIMINE TO
PRECLUDE EVIDENCE
REGARDING REMOVED
ADVERTISING**

C.J. ENVIRONMENTAL, INC. d/b/a CASH
FORGOLDUSA.COM, EMMA JOHNSON, INC.
d/b/a WEALTHYSINGLEMOMMY.COM, STEER
DIGITAL LTD., DANIEL BROWN, and ADAM
TOUTAIN,

Case No.: 1:22-cv-00352-LJV

Defendants.

PLEASE TAKE NOTICE that a motion will be made for the relief specified herein
in connection with the above-entitled action as follows:

MOVING PARTY: Defendant C.J. Environmental, Inc.

**DATE, TIME AND
PLACE OF HEARING:** At a date and time to be determined by the Court at the
United States District Court for the Western District of
New York (Buffalo Courthouse), before the Honorable
Lawrence J. Vilardo.

**RELIEF SOUGHT AND
GROUNDS THEREFOR:** An Order pursuant to Fed. R. Evid. 401, 402, 403 and
404 precluding Plaintiff Express Gold Cash, Inc. from
introducing any evidence at the preliminary injunction
hearing regarding advertisements or statements
Defendants voluntarily removed from their websites,
including evidence regarding the creation and publishing
of that removed advertising, along with such other and
further relief the Court deems necessary.

SUPPORTING PAPERS: Memorandum of Law dated October 11, 2022.

ORAL ARGUMENT: Requested.

Dated: October 11, 2022

BOND, SCHOENECK & KING, PLLC

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